

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, *et al.*, *ex*
rel. JULIANNE NUNNELLY and
MATTHEW SHANKS

Plaintiffs,

v.

1:20-cv-11401-PBS

REGENERON PHARMACEUTICALS,
INC.,

Defendants.

DEFENDANT’S MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant Regeneron Pharmaceuticals, Inc. (“Regeneron”) hereby moves the Court for leave to file under seal: (1) an unredacted version of Regeneron’s Memorandum in Support of the Motion to Continue the Sealing of Provisionally Sealed Confidential Information (“Memorandum in Support”); and (2) the attendant attachments to the Memorandum in Support, including an unredacted Declaration of Rena K. Goins and proposed redactions of exhibits previously filed by the government under provisional seal. It is Regeneron’s understanding that the Court has ruled that its Motion to Continue the Sealing of Provisionally Sealed Confidential Information (“Motion to Seal”) is to be filed by Thursday, April 18.

In support of this Motion, Regeneron states that these documents contain (1) highly sensitive business information, the public release of which could cause severe economic and competitive harm to Regeneron, and (2) reflect confidentiality redaction requests made by third parties. Further support for this motion will be contained in the Memorandum in Support and Attachments.

LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), undersigned counsel hereby certifies that counsel for Regeneron conferred with counsel for the United States, who, while opposing the Motion to Seal, do not oppose this Motion for Leave.

Dated: April 17, 2024

Respectfully Submitted,

REGENERON PHARMACEUTICALS, INC.,

By its attorney,

/s/ Gregory F. Noonan

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2024, a true and correct copy of the foregoing Motion was served via ECF on all counsel of record.

/s/ Gregory F. Noonan
Gregory F. Noonan